

April 28, 2025

**Via CM/ECF**

The Honorable Gerald J. Pappert  
United States District Judge  
United States District Court  
Eastern District of Pennsylvania  
11614 U.S. Courthouse  
601 Market Street  
Philadelphia, PA 19106

**Re: Leon Weingrad, individually and on behalf of all others similarly situated v.  
Baker Solutions Inc. d/b/a CreditBaker  
U.S.D.C., E.D.Pa., No. 2:25-cv-01792-GJP**

Dear Judge Pappert:

This firm represents Defendant Baker Solutions Inc. d/b/a CreditBaker (“Defendant”) in the above action. I am writing to respectfully request a thirty-day (30) extension for Defendant to answer, move, or otherwise plead to Plaintiff Leon Weingrad’s (“Plaintiff”) Complaint to June 4, 2025. (Doc. 1). Defendant’s current deadline for filing a responsive pleading is May 5, 2025. (Doc. 4). This is Defendant’s first request for an extension to answer, move, or otherwise plead.

Defendant was served with the Complaint on April 14, 2025. (Doc. 4). My firm was retained to represent Defendant in this matter on April 21, 2025. On April 24, 2025, undersigned counsel contacted Plaintiff’s counsel via e-mail to request a thirty-day (30) extension of the deadline for Defendant to answer, move, or otherwise plead. Plaintiff’s counsel responded the same day and advised that Plaintiff did not oppose this request.

Defendant respectfully requests an extension to answer, move or otherwise plead to Plaintiff’s Complaint to June 4, 2025 to provide Defendant’s counsel the appropriate and necessary time to investigate Plaintiff’s allegations and respond accordingly, as counsel was retained only last week. This is a complicated class action involving claims under the Telephone Consumer Protection Act, 47 U.S.C. § 227, *et seq.* (“TCPA”), requiring extensive investigation and analysis by counsel before responding to the Complaint. An extension would not prejudice Plaintiff at this early juncture in the case, and the lack thereof would be detrimental to Defendant’s ability to properly investigate and defend all claims asserted against them in Plaintiff’s Complaint.

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Defendant, therefore, respectfully requests that this Court extend the deadline for Defendant to answer, move or otherwise plead to Plaintiff's Complaint to June 4, 2025.

Respectfully,

/s/ Richard J. Perr

Richard J. Perr

cc: Andrew Perrong, Esquire (via CM/ECF)